

ETHYL CORPORATION

LAW DEPARTMENT

April 17, 1984

ETHYL TOWER
481 FLORIDA
BATON ROUGE, LA. 70801

Thomas Daggett, Esq.
Assistant Regional Counsel
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Daggett:

This will summarize the telephone conversation of April 12, 1984 among yourself, Dan Hopkins and Roger Field of EPA and Don Park and myself of Ethyl Corporation.

In regard to the Health and Safety Plan, EPA suggested that a high efficiency particulate (full-face) respirator be used by laborers. EPA also suggested that water used to decontaminate equipment be minimized, collected and secured on site.

In regard to the construction program itself, EPA suggested that the dirt piled around the edges of the tank replacement project be collected and secured rather than used as fill dirt. Similarly, EPA suggested that dirt along the track project contaminated with 1 ppb 2378 TCDD be collected and secured. EPA concurred that the existing placement of 4 inches of crushed stone over the earthen area by the large storage tanks is adequate. EPA suggested the soil that had previously been removed from the track area be adequately covered and secured, if contaminated.

We will consider the comments and submit a revised health and safety plan and a revised description of the construction project, if appropriate. Construction may proceed in accordance with the above.

In regard to the quality assurance program, you indicated that you will be providing the lab's comments by April 19 or early the following week or will be taking other measures to have the program reviewed.

EPA also suggested additional points to be considered in examining longer term solutions.

EPA summarized the goals of the data collection to be the determination of the extent of contamination, and potential migration. Among the data collection tasks would be: definition of the perimeter of contamination; characterization of materials in the soil other than 2378 TCDD which may have allowed migration of 2378 TCDD; definition of the geohydrology in the area,

Thomas Daggett, Esq.
April 17, 1984
Page 2

using in large part the data to be generated by Monsanto in its groundwater studies; definition of surface drainage patterns; and location of equipment used in manufacturing Agent Orange. EPA renewed its suggestion of groundwater monitoring, while noting the validity of some of our technical concerns about such monitoring.

EPA also suggested that the data collected would be used to examine the feasibility of several long term solutions: securing the contaminated soil on site; securing the soil off-site; stabilizing the soil in place; and treatment by incineration, chemical extraction or bacterial destruction.

Mr. Hopkins will send these and other suggestions in writing.

I indicated that we would consider the suggestions and incorporate the thrust of them in the description of an RI/FS that we are developing in accordance with my last letter.

You, of course, reiterated your need to incorporate these considerations into an order. Again, I suggest that we consider such a possibility only in the context of a reasonable scope of work and that our attention be focused on preparation and review of a reasonable RI/FS.

Respectfully yours,

ETHYL CORPORATION



By: David C. Bach
Assistant Counsel

DCB:nm

cc: S. McWilliams
D. E. Park

bcc: Brent Gilhousen
Jack Malloy